

Scott Leonard, OSB No. 074761
Law Office of Scott Leonard, LLC
4511 SE 63rd Ave., Ste F
Portland, OR 97206
Tel: 503.222.0722
Email: scott@scottleonardlaw.com
Attorney for Defendant Manuel Antonio Souza Espinoza

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MANUEL ANTONIO SOUZA
ESPINOZA,**

Defendant.

Case No. 3:22-cr-00135-IM

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE TRIAL
DATE AND WAIVER OF SPEEDY
TRIAL**

Defendant Manuel Antonio Souza Espinoza, through attorney Scott Leonard, moves the court for an order continuing the current trial date in this matter for 120 days. No current trial dates are scheduled. Mr. Souza Espinoza has been advised of this request and consents to it. The government, though AUSA Scott Kerin, does not object.

Mr. Souza Espinoza waives his right to a speedy trial until the next trial date and agrees that any continuance granted by the court and any new trial date shall be considered excludable delay and shall not be counted toward the 70-day pretrial limit required under the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A).

Respectfully submitted this 29th of September, 2022.

/s/ Scott Leonard
Scott Leonard, OSB No. 074761
Attorney for Defendant